

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

JOSE S. GARZA  
Plaintiff

Civil Action No. 4:12-cv-03532

Judge Nancy F. Atlas

v.

NATIONAL OILWELL VARCO, L.P.  
Defendant

**WITNESS LIST OF DEFENDANT NATIONAL OILWELL VARCO, L.P.**

Defendant National Oilwell Varco, L.P., (hereinafter “Defendant” or “NOV”)

hereby submits its Witness List, stating as follows:

**MAY CALL**

1. Jose Garza

Subject of Information: Mr. Garza is expected to testify regarding his claims against NOV.

2. William Goff, Sr.

Subject of Information: Mr. Goff is expected to testify about facts supporting NOV’s defenses.

3. Rudy Lopez  
11919 FM 529  
Houston, Texas 77041

Subject of Information: Mr. Lopez is expected to testify about facts supporting NOV’s defenses.

4. Bill Butler  
6390 N. Eldridge Pkwy.  
Houston, Texas 77041

Subject of Information: Mr. Butler is expected to testify about facts supporting NOV’s defenses and consistent with his deposition testimony.

5. Jack Landis  
11919 FM 529  
Houston, Texas 77041

Subject of Information: Mr. Landis is expected to testify about facts supporting NOV's defenses, including facts surrounding the termination of Plaintiff's employment, and consistent with his deposition testimony.

6. Kevin Warren

Subject of Information: Mr. Warren is expected to testify about facts supporting NOV's defenses, including facts surrounding the termination of Plaintiff's employment.

7. Meredith Black Bruce  
10000 Richmond Avenue  
Houston, TX 77042

Subject of Information: Ms. Bruce is expected to testify about facts supporting NOV's defenses, including her investigation into Plaintiff's claims in April/May 2009, and consistent with her deposition testimony.

8. Bob Miller

Mr. Miller is expected to testify about facts supporting NOV's defenses, Plaintiff's employment, and consistent with his deposition testimony.

9. James Posada

Mr. Posada may testify regarding facts related to Plaintiff's claims or Defendant's defenses.

10. Steven Hunt

Mr. Hunt may testify regarding facts related to Plaintiff's claims or Defendant's defenses.

11. Enrique Castellanos

Mr. Castellanos may testify regarding facts related to Plaintiff's claims or Defendant's defenses.

12. Anirban Banerjee

Mr. Banerjee may testify regarding facts related to Plaintiff's claims or Defendant's defenses.

13. Jeff Dodd  
10000 Richmond Avenue  
Houston, TX 77042

Mr. Dodd may testify regarding facts related to Plaintiff's claims or Defendant's defenses.

14. Miguel Gutierrez  
11919 FM 529  
Houston, Texas 77041

Mr. Gutierrez may testify regarding facts related to Plaintiff's claims or Defendant's defenses.

15. Lon Allchin  
10000 Richmond Avenue  
Houston, TX 77042

Mr. Allchin may testify regarding facts related to Plaintiff's claims or Defendant's defenses.

16. Richard Urquhart

Mr. Urquhart may testify regarding facts related to Plaintiff's claims or Defendant's defenses.

17. Alfredo Amaya

Mr. Amaya may testify regarding facts related to Plaintiff's claims or Defendant's defenses.

18. Marco Calderon  
11919 FM 529  
Houston, Texas 77041

Mr. Calderon may testify regarding facts related to Plaintiff's claims or Defendant's defenses.

19. Jose Roberto Lanzas  
11919 FM 529  
Houston, Texas 77041

Mr. Lanzas may testify regarding facts related to Plaintiff's claims or Defendant's defenses.

20. Jose Amancio Martinez

Mr. Martinez may testify regarding facts related to Plaintiff's claims or Defendant's defenses.

21. Luis Rodriguez  
11919 FM 529  
Houston, Texas 77041

Mr. Rodriguez may testify regarding facts related to Plaintiff's claims or Defendant's defenses.

22. Fredy Rubiano  
11919 FM 529  
Houston, Texas 77041

Mr. Rubiano may testify regarding facts related to Plaintiff's claims or Defendant's defenses.

23. Richard Tellez

Mr. Tellez may testify regarding facts related to Plaintiff's claims or Defendant's defenses.

24. Julissa Barrios

Ms. Barrios may testify regarding facts related to Plaintiff's claims.

Respectfully submitted,

/s/ Christopher E. Moore

Christopher E. Moore, Esq.

(Attorney-in-Charge)

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SDTX Admission No. 713063

Christine M. White, Esq.

Texas Bar No. 24068713

SDTX Admission No. 712655

Jennifer L. Englander, Esq.

LA State Bar No. 29572

SDTX Admission No. 1430436

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Attorneys for Defendant

National Oilwell Varco, L.P.

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing Defendant's Witness List has been served on the following counsel of record via the Court's Electronic Filing/Notification System:

Peter Costea, Esq.  
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This 11<sup>th</sup> day of July, 2014.

/s/ Christopher E. Moore

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